

Project Review Comments			Type: Concept: Final: xx Other:	Page 1 of 2 Date: 5/22/02
Project: UMR & IWW Restructured Navigation Study – Draft Interim Report Location:			Reviewer: Name: Ken Brummett Organization: Missouri Department of Conservation	
Comment Number	Drawing/ Number	Page/ Space	COMMENT	ACTION
1		12	tonnage listed for UMR does not agree with Figure 18 or paragraph 5 on page 16 – this is also found in the Executive Summary, Page 5	Revised.
2		16	Check tonnage figures against total commodities on Page 12	Revised.
3		22	1.7.1.6.1 – spelling of “management “ in first bullet	Revised.
4		28	Theme 1b – third paragraph: “relief” should be “relieve”	Revised.
5		30	Issue 9 – LTRMP is most likely program to do monitoring, but should remain a distinct program.	Noted.
6		32	1.8.4 – the NECC/ECC meeting was in November 2001, also check next to last sentence in paragraph.	Revised.
7		40	First paragraph – the recommendation needs to be an integration of pool plans to cover all disciplines. This suggests several separate ones.	Revised.
8		44	2.4.2.1.2. – do your lock capacities correspond to actual shipping. Is this figure (45-55 M tons) less than on Page 16 (total commodities) because not all is being shipped to the Gulf? Or, is this just a misunderstanding of what you want to say?	Revised.

9		45	Table 3 – last column, is this % figure for actual “in lock” time? If so, none appear to be at full capacity. Does the current 70-80% utilization of the lower locks in what appears to be a “flat” period for shipping justify the urgency? Has utilization reflecting the time savings associated with non-structural and small scale measures been calculated? Does a 23-27minute time savings translate into 20% or so less utilization? The 1200 foot lock at L & D 26 is only being utilized 50% of the time. Will longer locks at 20-25 result in the same utilization rate? Is it a justifiable expenditure to expand the lower locks assuming they will be have a similar utilization to L & D 26?	Table Revised.
10		48	2.4.2.1.8 – does all-land routing mean “rail only” Commodity shipping to the Gulf does not go by truck, at least from the UMR states.	Revised.
11		49	Last paragraph – are the delays listed seasonal or continually occurring? Delay times by month would be more meaningful. If the delay is only occurring for two months of the year, can longer locks be justified? If there is a rush to get grain to the Gulf, only to sit in an elevator for several weeks or months before it is put on a cargo vessel, what is the hurry? The bottom line is: delays cost the shipping industry for fuel and personnel time. If their fuel and personnel expenses decrease because of shorter lockage times, will the savings be transmitted to the producers?	Revised.
12		52	Figure 9 doesn’t really contribute much. If you want to show relative distribution of the elements of the figure, the table that presents the same information may do a better job.	Noted.
13		53	Figure 10 - caption ...dam gates are opened with potential fish passage. Open gates does not necessarily mean fish are passing through them.	Revised.
14		60	Figure 14 – need something, maybe a double-ended arrow to show increase or decrease of cumulative impacts on y-axis to make the meaning more clear.	Revised.
15		61	2.4.2.3, 2 nd paragraph – I suggest an average value of floodplain agricultural land for all five states. The average price of ag land in IL may be inflated by prime farmland in east-central IL that sells for \$3-4,000 per acre.	Will be update the feasibility study.
16		75	Better explanation on the y-axis of the figure. See Comment 14	Axis revised.

17		89	Table 20 – I would like to see a category showing time savings and cost for a switchboat/remote mooring facility combination.	Revised.
18		91	2.5.1.1.3.1, 2 nd sentence - ...some lock placements are not feasible.	Revised.
19		96	2.5.1.2 – change to: A summary of measures is presented in Table 26, a more comprehensive list of ... because the list is not a totally complete one.	Revised.
20		99	3 rd paragraph – MVR began a 404 (b)(1) evaluation ... MVS had developed dredge disposal guidelines in 1996. (These were initiated by Norm Stucky and developed through coordination between MDC, ILDNR, FWS, and MVS.)	Revised.
21		99	2.5.1.2.2.1 last paragraph – you might want to mention that MVS is investigating the use of longer flexible pipe for the dustpan dredge so they have more disposal options.	Revised.

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22		100	2. through 5. – you might want to let Mike Cox and his colleagues in MVS and MVP flesh out this section.	Revised.
23		100	2.5.1.2.3 – EPM was initiated on the premise that river discharge would dictate whether it would happen each year. We set several criteria that had to be met and it has happened every year, not necessarily for the same 30-day period.	Noted.
24		100	Last paragraph – Three of Four UMRS Districts (How many are there?)	Revised.
25		101	Paragraph 3 – Any way to clarify the last sentence? It's difficult to understand your point.	Revised.

26		102-103	You may need to say something about industry input on placement of mooring facilities. If tow captains don't like where a cell or buoy is, they will not use it.	Concur. Site specific placement will be discussed in feasibility study.
27		104	2.5.1.3.2 – Any ideas on cost to industry if draft depth restrictions are put into place, especially if they coincide with migration, spawning, etc.	Will be assessed in the feasibility study.
28		105	Last paragraph - ...even land acquisition. Presently the Corps does not have... ...waters owned by the Corps currently require cost-share partners.	Revised.
29		106	Use of the term “Alternatives” indicates a choice must be made, not an accumulation of actions. It would take a lot of editing, but would “Measures” make more sense.	Revised. Measures are added to form alternatives.
30		108	2.5.2.2 – first paragraph. You need to include “impacts associated with expansion of the capacity of” the navigation system.	Revised.
31		110	See comment on Figures 14 and 19. The ascending line needs to show a more realistic trend if it stays relatively flat just past 1940 indicating the increase in habitat, nutrients, etc., then ascends steeply to about 1955 or 1960 and then continues on a less steep slope to the 2002 level. This figure is used several times and would be easier to understand if all had the same axis titles.	Revised.
32		112	First paragraph - ... the most urgent needs for the environment may be met...	Revised.
33		113	b) Effects on vegetative reproduction due to sediment re-suspension ...	Revised.
34		113	Last paragraph - ...wave effects on plants or to prevent sediment ...	Revised.
35		114	3.1 Introduction, last sentence – correct spelling of implementation	Revised.
36		116	3 rd paragraph - ...encourage farmers and ranchers to employ the ...	Revised.
37		117	3.3.2 – matter should be changed to manner	Revised.
38		121	First paragraph – there is a bracket] after ... ecosystem restoration objectives. It also appears in the Executive Summary.	Revised.

39		125	The word “Stakeholder” is a leftover or an unfinished thought.	Deleted.
40		125	10. Conclusion, 2 nd sentence – this reads better if “effects” is replaced with “components”.	Revised.
41		125	11. Conclusion, 1 st and 2 nd sentence – How was this cost savings to the nation calculated? To whom did the savings go? Are taxpayers paying \$175 M per year to give the large shippers \$800 M in savings/profit? Commodity producers are not getting any more for their products. Consumers are other countries. So the savings goes to those directly or indirectly connected to the shippers.	Benefits to the system are measured in terms of National Economic Development Benefits and are not specific to a entity.
42			General Comment: Did this draft fulfill the guidance set out in the 8/2/01 Memorandum? Is it a conceptual plan for modifying the system to relieve lock congestion and achieve environmental sustainability? Does it address additional authorization that may be necessary to investigate navigation, ecosystem, and related needs in a comprehensive manner? Are procedural, sponsorship, or cost-sharing issues addressed? Are any measures recommended that will help meet current needs until permanent solutions are evaluated? The draft contains a lot of information on all the above subjects, though I’m not sure it gave definite answers to some of these questions. It does provide background for a lot of the information that will be needed to get to the answers, though.	Noted.

